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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

KYO HAK CHU, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ZECHSAN BUSINESS DEVELOPMENT,
INC. d/b/a EXECUTIVE ORDER BAR &
LOUNGE, a California corporation; and
DOES 1 to 10, inclusive,

Defendants.

Case No.: 4:21-cv-00312-HSG

CLASS ACTION

Honorable Judge Haywood S. Gilliam Jr.

**STIPULATION FOR DISMISSAL OF
PLAINTIFF'S INDIVIDUAL CLAIMS WITH
PREJUDICE AND PUTATIVE CLASS
CLAIMS WITHOUT PREJUDICE
PURSUANT TO FEDERAL RULE OF CIVIL
PROCEDURE 41 (a)(1)(A)(ii)**

Complaint Filed: January 13, 2021
Trial Date: None Set

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Kyo Hak Chu and Defendant Zechsan Business Development, Inc. dba Executive Order Bar & Lounge stipulate and jointly request that this Court enter a dismissal with prejudice as to Plaintiff's individual claims in their entirety and without prejudice as to the claims of absent putative class members in the above-entitled action. Each party shall bear his or its own attorneys' fees and costs.

Dated: April 7, 2022

WILSHIRE LAW FIRM, PLC

/s/ Thiago M. Coelho

Thiago M. Coelho
Attorneys for Plaintiff and
Proposed Class

Dated: April 7, 2022

RYAN GRIFFITH LAW APC

/s/ Ryan C. Griffith

Ryan C. Griffith, Esq.
Attorneys for Defendant

SIGNATURE ATTESTATION

I hereby attest that all signatories listed above, on whose behalf this joint stipulation is submitted, concur in the filing's content and have authorized the filing.

Dated: April 7, 2022

WILSHIRE LAW FIRM, PLC

/s/ Thiago M. Coelho

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